

UNITED STATES DISTRICT COURT  
FOR THE  
EASTERN DISTRICT OF NORTH CAROLINA

DONNA R. SANTIFORT,

Plaintiff,

v.

SUE GUY, in her personal capacity; LEE  
SMITH, in his personal capacity; JOE  
GURLEY, in his personal capacity; and  
STEVE KEEN, in his personal capacity; and  
COUNTY OF WAYNE, NORTH  
CAROLINA;

Defendants.

Civil Action No. \_\_\_\_\_

---

**COMPLAINT**

---

NOW COMES Plaintiff Donna R. Santifort, by and through the undersigned counsel, complaining of the Defendants and saying that:

1. Plaintiff Donna R. Santifort (“Santifort”) is a citizen and resident of Lenoir County, North Carolina.

2. Defendant County of Wayne, North Carolina (“the County”) is a local government entity, which has jurisdiction in Wayne County, North Carolina, and who employed Santifort during the time period relevant to this Complaint.

3. Defendant Sue Guy (“Guy”) is the former Human Resources Manager of the County’s Office of Emergency Medical Services (“OEMS”). Guy is, upon information and belief, a citizen and resident of Duplin County, North Carolina and is under no legal disability.

4. Defendant Lee Smith (“Smith”) is the former County Manager for the County and is, upon information and belief, a citizen and resident of Chatham County, Georgia and is under no legal disability.

5. Defendant Joe Gurley (“Gurley”) is a former employee of the County and is now a County Commissioner for the County who, upon information and belief, a citizen and resident of Wayne County, North Carolina and is under no legal disability.